

BERRY APPLEMAN & LEIDEN

Jeff Joseph (CO Bar No. 28695) (*pro hac vice pending*)
2400 N. Glenville Drive
Richardson, Texas 75082
(720) 273-4647
Email: jjoseph@bal.com

Attorney for Plaintiff
Student Doe #1

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Student DOE #1

Case No. 2:25-cv-02825-MCA-LDW

Plaintiff,

v.

Donald J. TRUMP, in his official capacity, President of the United States of America;

John TSOUKARIS, in his official capacity as ICE Enforcement and Removal Operations New Jersey Field Office Director;

Todd M. LYONS, in his official capacity, Acting Director, Immigration and Customs Enforcement, U.S. Department of Homeland Security; and

Kristi NOEM, in her official capacity, Secretary, U.S. Department of Homeland Security;

Defendants.

PROPOSED BRIEFING SCHEDULE

Pursuant to this Court's text order (ECF 6), parties have conferred and propose the briefing and argument schedule below.

Defendants have requested until Friday, April 25th to respond the Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction.

Given the Easter Holiday, Plaintiffs are amenable to this briefing schedule with a stipulation that the Defendants will take no enforcement action including arresting, initiating removal proceedings, detaining, transferring, or deporting the Plaintiff until this Court is able to resolve and rule on the Motion for the Temporary Restraining Order.

Assistant United States Attorney, Angela Juneau, is consulting with the Defendants to get their position on this stipulation, however, she has been unable to reach the Defendants to get the stipulation by the Court imposed deadline of close of business today.

Therefore, Plaintiffs request that this Court issue a temporary emergency injunctive order prohibiting the Defendants from taking any of the enforcement actions mentioned above until the Court is able to resolve the Temporary Restraining Order. This temporary emergency injunctive order would expire when the Court rules on the Motion for Temporary Restraining Order.

Defendants do not agree to the temporary emergency order.

Dated: April 18, 2025

Respectfully submitted,
/s/ Jeff Joseph
Jeff Joseph
Berry Appleman & Leiden
2400 N. Glenville Drive
Dallas, TX 75082
(720) 273-4647
jeff@immigrationissues.com

/s/ Gregory Copeland
Gregory P. Copeland
Law Office of G P Copeland
6565 Spring Brook Avenue, Suite
8, #195
Rhinebeck, NY 12572

Tel.: (845) 280-6446
g@gpcopeland.com